

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
)	
Defendant.)	

**PLAINTIFF *ePLUS* INC.’S MOTION TO SHOW CAUSE WHY LAWSON SOFTWARE,
INC. SHOULD NOT BE HELD IN CONTEMPT OF THE COURT’S PERMANENT
INJUNCTION AND REQUEST FOR EXPEDITED BRIEFING**

Plaintiff *ePlus*, Inc. (“*ePlus*”) moves the Court to enter an order requiring Defendant Lawson Software, Inc. (“Defendant”) to show cause why it should not be held in contempt for violating the permanent injunction entered in this action. A jury of this Court, after a three-week trial in January 2011, returned a verdict of infringement against the Defendant, finding that Defendant’s Configuration 2 (Core S3 Procurement + RSS), Configuration 3 (Core S3 Procurement + RSS + Punchout), and Configuration 5 (Core S3 Procurement + RSS + Punchout + EDI) infringe *ePlus*’s patents. In May 2011, this Court entered an order enjoining Defendant from continuing its infringing activity. Notwithstanding the order of the Court, Defendant continues to infringe the *ePlus* patents in violation of the express terms of the injunction.

Accordingly, *ePlus* respectfully requests an order from the Court requiring Defendant to show cause why it should not be held in contempt for violating the permanent injunction. *ePlus* requests expedited briefing on its motion such that Defendant’s opposition to *ePlus*’s motion shall be due on Monday, September 19, 2011, and *ePlus*’s reply brief shall be due on Thursday,

September 22, 2011. Defendant has indicated that it does not oppose this briefing schedule. ePlus also requests a status conference to determine the parameters of a proper inquiry into Defendant's alleged violation of the permanent injunction. Finally, ePlus requests an order granting it leave to conduct limited discovery regarding Defendant's alleged violation with the permanent injunction.

The grounds for this motion are more fully set forth in the accompanying brief in support.

Respectfully submitted,

September 9, 2011

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of September, 2011, I will electronically file the foregoing

**MOTION TO SHOW CAUSE WHY LAWSON SOFTWARE, INC. SHOULD NOT BE
HELD IN CONTEMPT OF THE COURT'S PERMANENT INJUNCTION
AND REQUEST FOR EXPEDITED BRIEFING**

with the Clerk of Court using the CM/ECF system which will then send a notification of such
filing (NEF) via email to the following:

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